

Our Ref: 26.175

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13 August 2026

Dear Sir/Madam,

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Request from Neath Port Talbot County Borough Council for Screening Opinion under Regulation 6 (1) in relation to Construction of 5.75km Linear Section of Replacement Pipeline (Marlas Wastewater Rising Main)

On behalf of Dwr Cymru Welsh Water (DCWW), Asbri Planning write to formally request a Screening Opinion (under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017), as to whether Environmental Impact Assessment (EIA) is required for the proposed construction of a 5.75km section of replacement pipeline, in association with DCWW's upgrade works to the existing Marlas Wastewater Rising Main.

As the route of the pipeline crosses two Local Authority areas (i.e Neath Port Talbot County Borough Council and Bridgend County Borough Council), the request for an EIA Screening Opinion is submitted to both Local Planning Authorities concurrently (with a Screening Direction to be issued by each Authority in relation to the area of land located within their jurisdiction accordingly).

As stated, the full length of the pipeline extends to 5.75km. To confirm, the length of pipeline located within Neath Port Talbot extends to 4.75km.

Screening Request – Submission Documents

As part of this request for an EIA Screening Opinion, in accordance with Regulation 6 (2), we provide the required information as follows:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular;
 - A description of the physical characteristics of the development;
 - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;
- d) A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from –
 - The expected residues and emissions and the production of waste, where relevant; and,
 - The use of natural resources, in particular soil, land, water and biodiversity; and

- e) Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Alongside this letter, the request for a Screening Opinion comprises the following supporting documents and drawings:

Document	Reference	Prepared By	Purpose of Document
Site Location / Red Line Boundary	Drawing Ref. P17979-121316-01-BG-DR-CA- CI0007_ EntireRouteRedLineBoundary-S2-P	Griffiths / Boroughs	Identification of application site boundary (5.75km linear pipeline + working window)
Existing & Proposed Route Plan	P17979-121316-01-BG-DR-CA- CI0500-S2-P13.0-General Arrangement Ma	Griffiths / Boroughs	Identification of positioning of existing pipeline
Longitudinal Section Drawing (construction underneath rhynes)	Drawing Ref. P17979-121316-01-BG-DR-CA-CI0530-S0-P2.0-Phase 5 Long Section	Griffiths / Boroughs	Provision of detail to demonstrate installation of new pipeline underneath rhyne bed.
Technical Method Statement Note	Marlas - Technical Method Statement note - Screening process - Pipe installation (5 th August 2025)	Griffiths	Provision of detail on specific construction method for works within SSSI.
Construction Environmental Management Plan	Construction Environmental Management Plan (TACP, November 2025) Version P3 13.08.26	TACP	Outline of mechanisms for implementing and monitoring environmental and ecological commitments and mitigation measures throughout the construction phase, ensuring compliance with relevant environmental legislation and best-practice guidelines.
Ecological Constraints and Method Statement for Margam Moors SSSI	Ecological Constraints and Method Statement for Margam Moors SSSI (TACP, June 2026) Version P2 13.08.26	TACP	Identification of Margam Moors SSSI specific constraints and associated package of controls; mitigation; management and monitoring in terms of minimising impact on SSSI.

Background

DCWW's existing Marlas rising main asset (which serves the Marlas Pumping Station at North Cornelly) has been subject to 37no. bursts since 2023 resulting from significant deterioration in the pipeline infrastructure. As such, DCWW are undertaking a programme of works to upgrade the asset.

The new rising main is required to ensure that DCWW are able to continue to pass forward the permitted flow from Marlas Pumping Station. The current overland mitigation pipework is not capable of taking the full permitted flows – this means that in the wetter autumn/winter/spring months the asset will remain a spill risk in to the River Kenfig, and the risk to the environment will remain in place until the permanent line is re-laid and commissioned.

As the Authority will be aware, certain works associated with the upgrade of below-ground pipeline infrastructure can be undertaken under Permitted Development by DCWW as Statutory Undertaker under The Town and Country Planning (General Permitted Development) Order Part 16, Class A – Development by Sewerage Undertakers. As sections of the upgrade works to the Marlas pipeline are located within land designated as SSSI, in light of SSSI designation being categorised as a ‘sensitive area’ as defined in Regulation 2(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, it is considered that the replacement pipeline project should be screened in accordance with the EIA Regulations.

It should also be noted that appropriate consent for works within the SSSI boundary will be sought from NRW as required, as a separate process the EIA Screening.

Site Description & Proposed Development

The proposed development comprises the installation of a total linear length of 5.75km of new High-Density Polyethylene Pipe (HDPE) pipeline running from Marlas pumping station (Grid Reference X281284, Y182212) within Bridgend County Borough to a location within TATA steelworks adjacent to Heol Heolcae'r Bont (Grid Reference X277591, Y184726) within Neath Port Talbot County Borough.

The Site Location/Red Line Boundary is illustrated in Figure 1, and shown on the enclosed Drawing Ref. P17979-121316-01-BG-DR-CA- CI0007_ EntireRouteRedLineBoundary-S2-P. The positioning of the Margam Moors SSSI and the Kenfig SSSI are identified by the green shading.

Figure 1: Site Location/Red Line Boundary



The route of the replacement pipeline largely tracks the route of the existing pipeline, as indicated on the enclosed 'Existing & Proposed Route Plan' (Drawing Ref. P17979-121316-01-BG-DR-CA-CI0500-S2-P13.0-General Arrangement Ma) – extract at Figure 2 below.

Figure 2: Existing & Proposed Route Plan



Black – Existing Pipe

Red – Proposed Replacement Pipe

The linear site is approximately 5.75km in length, with the red line/application boundary also including the associated construction zone/working envelope which extends to circa 10m either side of the proposed pipe alignment. The new pipe being installed is 560mm in diameter for the first 2.4km then 630mm for the remaining 3.3km. All pipework is buried below ground apart from a section over the Afon Cynffig where it crosses above the river in a piped sleeve.

The main site compound will be located at Kenfig Industrial Estate, with a number of smaller-scale temporary satellite compounds located along the route to serve the various phases of work. All compound areas will be located outside the boundary of SSSI designation.

With regards to the duration of the temporary works, DCWW estimate that the entirety of the route of the pipeline will be installed by July 2027. The works will progress in phased manner, with proposed works within the Margam Moors SSSI sections to be completed within a 6-month period.

Construction Method (Including Rhyne Crossings)

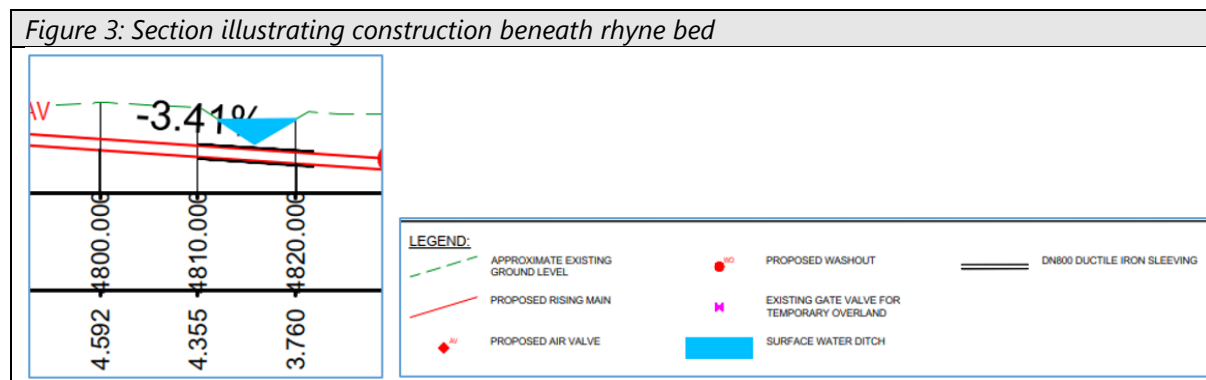
In light of the positioning of the replacement pipeline within sections of land designated as SSSI, significant assessment work has been undertaken in relation to the preferable construction method which will minimise the impact on the sensitive ecological features of the SSSI. Accordingly, DCWW propose to undertake works to replace the pipeline within the SSSI sections utilising the trench box

construction method, which represents a less invasive development option reducing the extent of excavation required and minimising vegetation clearance.

A 'Technical Method Statement Note' (prepared by the Contractor) is enclosed which provides further detail on the proposed construction method within the areas of the site subject to SSSI constraint. This includes specific detail in regards to the treatment of the rhynes within the Margam Moors SSSI.

It is the case that the proposed pipeline will be required to cross existing rhynes. In all instances, installation will take place beneath the bed of the watercourse, as opposed to placing the pipeline within the rhyne itself. This approach avoids the need for the pipeline to occupy the watercourse channel and therefore minimises direct and permanent interference with the existing drainage network.

The enclosed 'Phase 5 Longitudinal Section Drawing' (Drawing Ref. P17979-121316-01-BG-DR-CA-CI0530-S0-P2.0-Phase 5 Long Section) provides a longitudinal section drawing to illustrate construction underneath the rhynes. Further sections are included within the 'Technical Method Statement Note' – please refer to extract copied at Figure 3 below.



Installing the pipeline beneath the bed allows the existing rhyne profile, bed and banks to be retained, thereby maintaining its existing hydraulic capacity and function. It avoids the need for permanent alterations to the channel, such as diversion, realignment, culverting or the installation of a pipeline within the channel. From an ecological perspective, locating the pipeline below the bed minimises direct disturbance to aquatic and marginal habitats and avoids the introduction of permanent infrastructure into the watercourse. Subject to appropriate construction controls and reinstatement (as detailed below), any disturbance associated with the crossing would be temporary, with the existing channel and associated habitat capable of being retained and restored following completion of the works.

The proposed below-bed crossing method therefore represents the preferable approach from both an environmental and engineering perspective, enabling the pipeline to pass beneath the rhyne while retaining the existing drainage infrastructure and minimising permanent effects on the watercourse.

Ecological Protection & Enhancement

As a central element of the development, a robust package of ecological enhancement works is proposed as part of the pipe installation works, in order to protect and enhance the sections of SSSI through which it passes, as outlined fully within the following (enclosed) reports. It should be noted that the reports referenced below refer to the SSSI section within Neath Port Talbot specifically (reports that relate to the SSSI constraints within Bridgend CBC are submitted alongside the concurrent screening request to Bridgend accordingly).

Ecological Constraints and Method Statement for Margam Moors SSSI (TACP, June 2026)

The Ecological Constraints and Method Statement (TACP, 2026) (enclosed) puts forward a robust package of controls; mitigation; management and monitoring in terms of minimising impact on the Margam Moors SSSI. In summary, this includes the following:

- Controls: extensive controls are outlined as being required on the site including Pre-works Assessment, Pre-Works Check, Environmental Permit to Work (if required), Toolbox Talk, and a full Ecological Watching Brief. With regards to the Ecological Watching Brief, all works are to be conducted under an Ecological Watching Brief provided by the onsite Ecological Clerk of Works unless specified otherwise by the Project Ecologist. Exceptions include if there are negligible ecological constraints (as assessed by the EcCoW or Project Ecologist at the Pre-works Assessment or Pre-Works Check stage). A minimum of one EcCoW per clearance and contractor gang will be required working within a single area unless specified otherwise prior to commencement.
- Mitigation: specific mitigation measures are outline as being required by species. This includes in relation to bats; otter; dormouse; badger; reptiles and amphibians; and birds (see Pages 8-11 of TACP Report for full details).
- Management & Monitoring: including for example the provision of a post-construction Landscape Environment Management Plan to ensure the recovery and establishment of habitats and protected species.

The Ecological Constraints and Method Statement (TACP, 2026) also sets out detailed methods by which the existing rhynes will be protected (refer to Paragraphs 3.5.32 – 3.5.36). In summary:

- Due to the ecological sensitivity of the SSSI, ***any work carried out within or near the rhynes network will be subject to improved protection measures***. The rhynes banks and channels will be regarded as high-value watercourses, and it will not be possible to carry out any excavation, trenching, or other intrusive operations within them. The ***pipeline route will use trenchless installation methods so that the pipe passes under the rhynes beds rather than through them***, and AG will supply long-section drawings to show this arrangement and to confirm that there will be no direct physical impact.
- ***Access to working areas near both the Afon Cynffig and the rhynes network will be carefully managed to minimise ground disturbance***. Existing tracks will be used wherever possible, and any temporary tracks created will be reused to limit the number of access routes across the site. The use of matting will be continually assessed to reduce rutting and compaction in soft ground conditions. All personnel will be made aware of the potential presence of protected species, including Great Crested Newt, and work areas will be left in a safe condition at the end of each shift to ensure that no wildlife becomes trapped in excavations or confined spaces. Exclusion zones will be established around watercourse margins using fencing and clear signage to prevent accidental encroachment.
- At the places ***where the pipeline passes under the rhynes channels, trenchless techniques such as HDD, thrust-bore or auger-bore will be used in order to avoid disrupting the rhynes banks and the flow of water***. The launch and reception pits will be situated outside the buffer zones, and the drilling fluids will be continuously monitored to prevent any accidental discharge. All drilling slurry will be collected and pumped into settlement tanks, with disposal carried out by a licensed waste contractor.
- When the work has been completed, the temporary protective measures will be taken down after approval has been given by the ECoW. The work sites will be restored to their original condition in keeping with the requirement that the areas should be returned to the state they were in before the works started. Any disturbed vegetation will be reestablished with suitable

native wetland plants. **A final inspection of both the Afon Cynffig and the rhyne network will be carried out, accompanied by photographic records and verification that water quality has returned to baseline levels.**

Construction Environmental Management Plan (TACP, November 2025)

Further to the Ecological Constraints and Method Statement, in addition, the enclosed CEMP outlines mechanisms for implementing and monitoring environmental and ecological commitments and mitigation measures throughout the construction phase, ensuring compliance with relevant environmental legislation and best-practice guidelines. A number of environmental management and action documents have been developed to support the CEMP which outline detailed procedures for implementing mitigation measures (as summarised at Table 1 of the CEMP). All work will be conducted in compliance with current wildlife legislation, the requirements set forth by Natural Resources Wales, BS 42020:2022 (Biodiversity Code of Practice for Planning and Development), and the scheme's Ecological Method Statements.

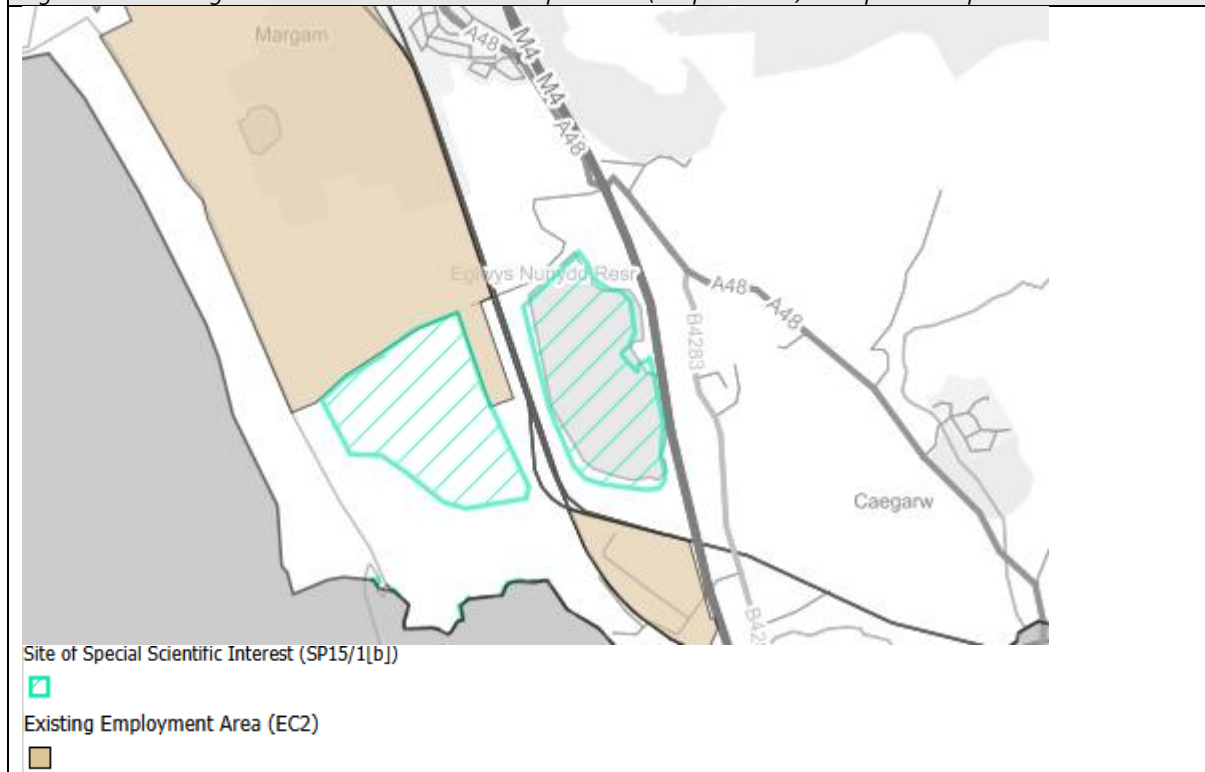
Overview of Site Characteristics

Ecology & Biodiversity

The subject site comprises a variety of existing habitat features along the 5.75km linear stretch, including coastal dune grassland, dense scrub, semi-improved neutral grassland and marshy grassland.

Within the boundary of Neath Port Talbot specifically, circa 1.1km of pipeline is currently located within the boundary of the Margam Moors SSSI. The positioning of the SSSI is identified on the Proposals Map of the adopted Neath Port Talbot Local Development Plan (LDP) (Figure 4).

Figure 4: SSSI Designation - Neath Port Talbot Adopted LDP (adopted 2016) – Proposals Map Extract

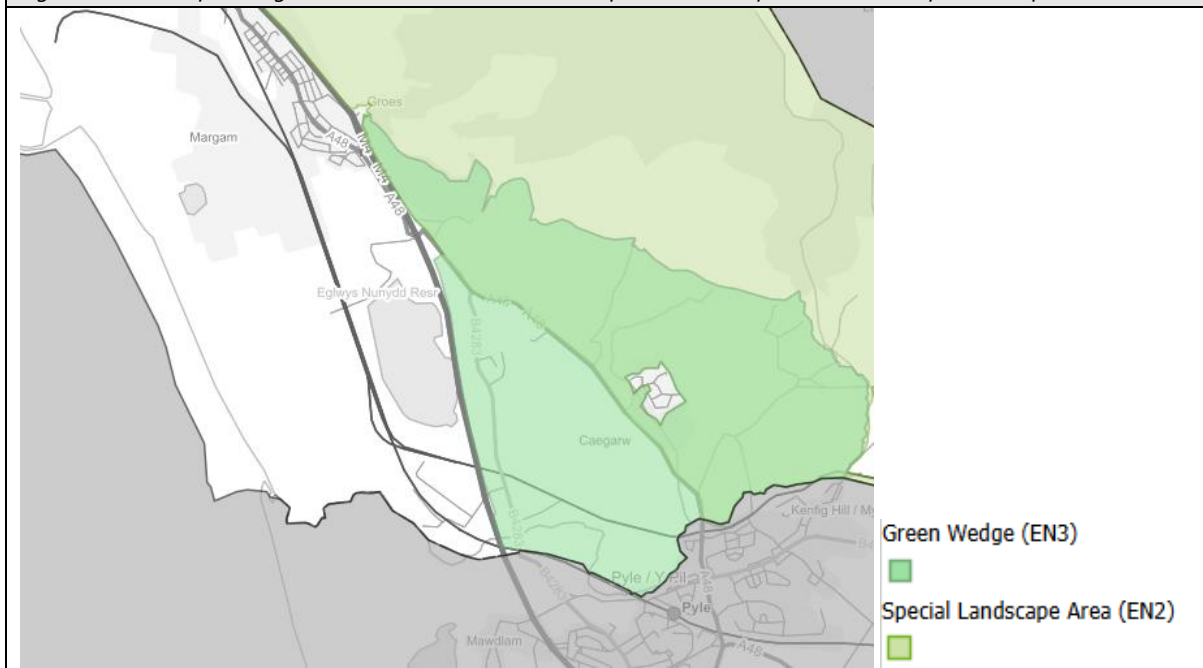


Landscape

The Application Site does not comprise land designated for landscape importance – it is not located within Special Landscape Area or Green Wedge, as shown on the LDP Proposals Map Extract at Figure

5. In addition, as per Figure 3, the site is located directly adjacent to, and partly includes, Existing Employment Areas.

Figure 5: Landscape Designation - Neath Port Talbot Adopted LDP (adopted 2016) – Proposals Map Extract



The Historic Environment

Within the boundary of Neath Port Talbot, the Application Site is located outside the boundary of the designated 'Registered Historic Landscape Area - Merthyr Mawr, Kenfig & Margam Burrows' (as shown on the Data Map Wales Registered Landscapes of Outstanding and of Special Interest in Wales extract at Figure 6). However, the site is located within a Character Area ('Margam Moors') associated with the aforementioned landscape area, although not forming part of the non-statutory designation (as shown at Figure 7).

Figure 6: Data Map Wales - Registered Landscapes of Outstanding and of Special Interest in Wales

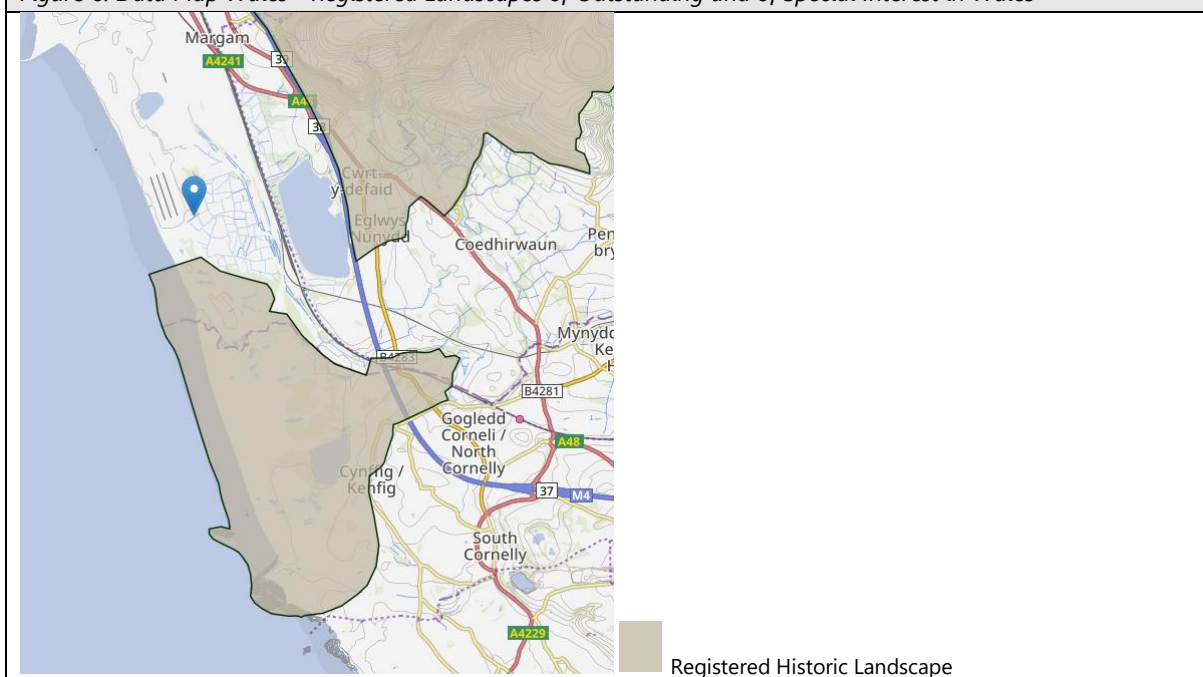


Figure 7: Heneb – Margam Moors Character Area Boundary

Margam Moors



Heneb provide an overview of the character area, describing Margam Moors as follows:

"Reclaimed and enclosed salt marsh wetland pasture; medieval/post-medieval fields and former medieval monastic grange land, varied field pattern with typical ridge and furrow, earth bank and drainage features."

Public Rights of Way

The Neath Port Talbot online Public Rights of Way mapping (extract at Figure 8) indicates that footpath route 5/92.PT/3 is situated in close proximity to the subject site, following the path of Heolcae'r Bont in an east-west direction. In addition, footpath route 5/93.PT/1 runs along the site in a north-south direction.

Figure 8: Neath Port Talbot Public Rights of Way Extract



Coal Mining Legacy

The Mining Remediation Authority map viewer (Figure 9) indicates the subject site is located within the Coal Mining Reporting Area. The site is partially located within the Development High Risk Area, as per the mapping extract below.

Figure 9: Mining Remediation Authority Map Viewer extract

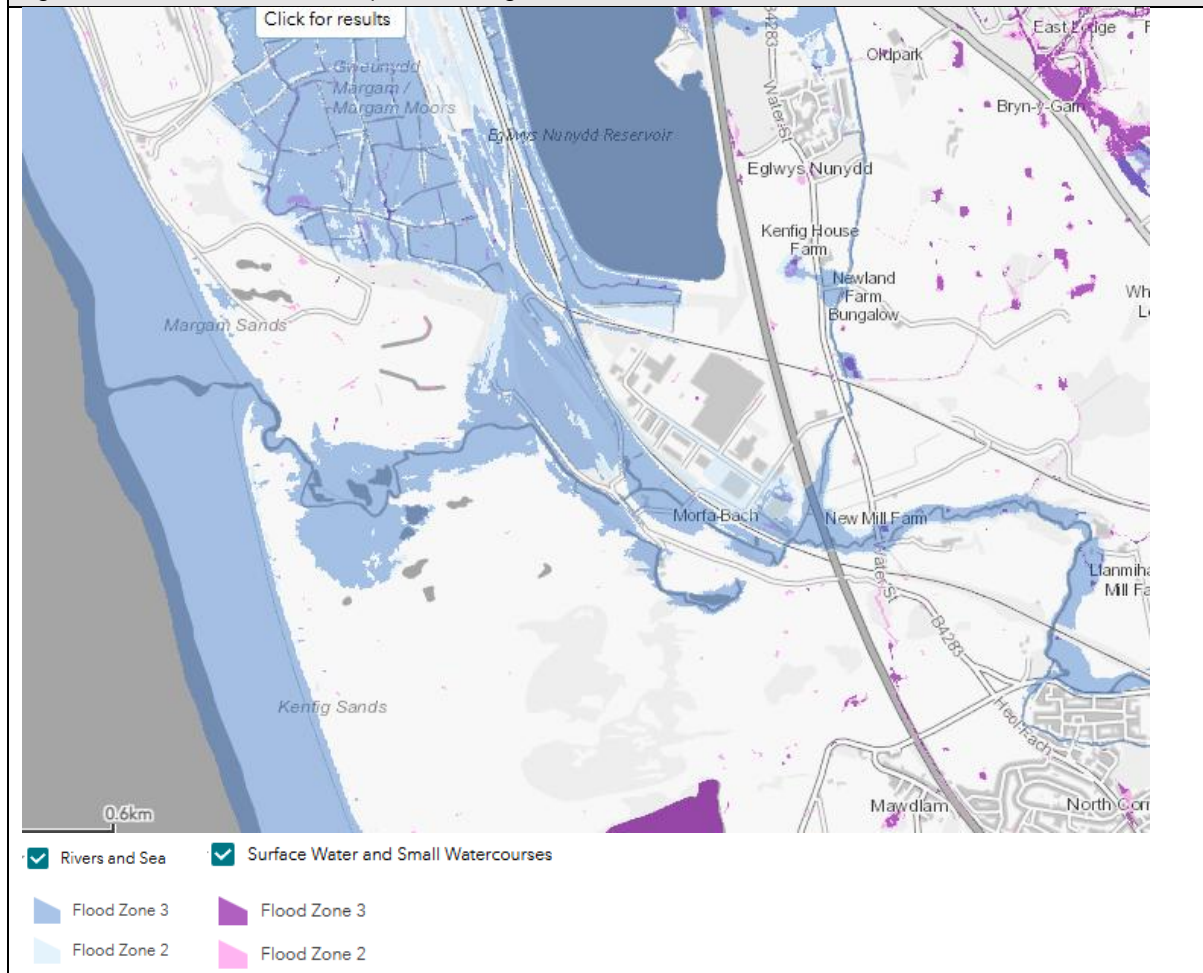


Flood Risk

The Natural Resources Wales TAN 15 Flood Map for Planning (Figure 10) indicates that large areas of the site are situated within Flood Zone 3 in respect of flood risk emanating from rivers and the sea (Areas with more than 1% (1 in 100) chance of flooding from rivers in a given year, including the effects of climate change). The site also crosses extents of Flood Zone 2 in respect of flood risk emanating from rivers and the sea (The combined 0.1% risk of flooding from rivers and the sea including climate change).

The subject site is relatively unconstrained by flood risk emanating from surface water & small watercourses, although dispersed pockets of Flood Zone 2 (Areas with 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding from surface water and/or small watercourses in a given year, including the effects of climate change) are identified within the path of the site.

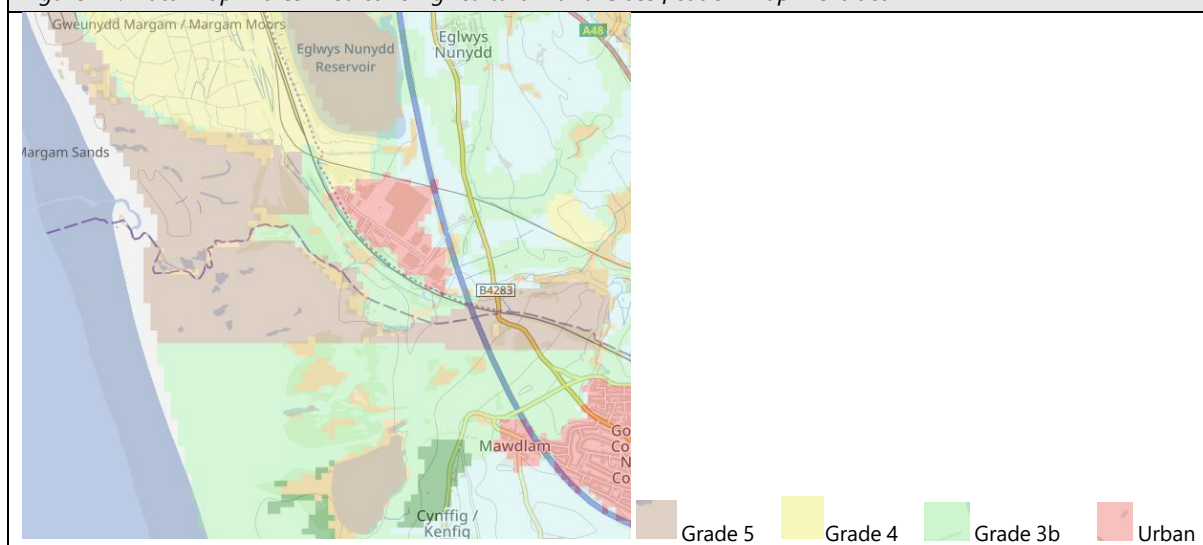
Figure 10: NRW TAN 15 Flood Map for Planning



Agricultural Land Classification

The Predictive Agricultural Land Classification Map (Figure 11) indicates the site mostly comprises Class 4 and 4 (poor and very poor-quality agricultural land), with some areas of Class 3b at best. The site therefore does not comprise the 'Best and Most Versatile' agricultural land.

Figure 11: Data Map Wales Predictive Agricultural Land Classification Map 2 extract



EIA Regulations - Schedule 2 Development

As set out within the Town and Country Planning (Environmental Impact Assessment) Wales Regulations 2017, "EIA development" means development which is either—

- (a) Schedule 1 development; or
- (b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development is not categorised as 'Schedule 1 development' where EIA would be mandatory.

'Schedule 2 development' is development of a type listed in Schedule 2 which:

- a) is located wholly or in part in a 'sensitive area' as defined in regulation 2(1); or*
- b) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in the second column of the table in Schedule 2.*

The proposed development could be considered to fall within the following development type listed in Schedule 2:

- *Class 10 – Infrastructure projects, sub-category (b) Urban development projects (with the relevant Schedule 2 threshold being 'The overall area of the development exceeds 5 hectares').*
- *Class 10 - Infrastructure projects, sub-category (l) Installations of long-distance aqueducts (with the relevant Schedule 2 threshold being 'The area of the works exceeds 1 hectare')*
- *Class 11 – Other projects, sub-category (c) Waste-water treatment plants (with the relevant Schedule 2 threshold being 'The area of the development exceeds 1,000 square metres').*

Notwithstanding the above, it is the case that the proposed development is located partly within a 'sensitive area' as defined in regulation 2(1) i.e. a "sensitive area" as defined in regulation 2(1) includes the following: *land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981.*

Based on the above, the development is therefore considered to comprise Schedule 2 development.

EIA Regulations – Schedule 3 Selection Criteria

Schedule 3 of the EIA Regulations sets out the selection criteria which must be taken into account in determining whether a development falling in Schedule 2 is "*likely to have significant effects on the environment*" (and is therefore EIA development). The three broad criteria set out under Schedule 3 are:

- 1) characteristics of the development;
- 2) the environmental sensitivity of the location; and
- 3) types and characteristics of the potential impact.

An assessment of the likely significant effects of the proposed development on the environment in the context of the selection criteria outlined in Schedule 3 of the Regulations is set out below.

'Characteristics of the Development'

A brief assessment of the detailed criteria outlined at Paragraph 1 of Schedule 3 in relation to the characteristics of the development is provided below:

(a) The size and design of the development

The total length of the pipeline to be constructed totals circa 5.75km, and forms a replacement of an existing section of pipeline of the same length and within the same broad location/routing. The 'size' of the development is therefore not considered to be significant in itself, and the associated width of the working window has been kept to a minimum, with sensitive construction methods within SSSI.

Furthermore, the works to construct the pipeline are temporary in nature, with the working area to be fully reinstated following construction.

In regard to the matter of the pipeline comprising the replacement of the existing pipeline, it is the case that the newly installed infrastructure will provide a substantial betterment in terms of long-term environmental quality. As detailed, the existing pipeline has been subject to a number of significant breaches within recent years as the condition of the existing pipeline has deteriorated. The installation of new pipeline infrastructure will ensure that the risk of future and ongoing pipeline breaches is reduced, thereby providing environmental betterment for the SSSI and wider area. The scheme therefore represents a beneficial infrastructure investment, with the temporary environmental effects associated with construction (as discussed within subsequent sections of this letter) balanced against the longer-term benefits of improved infrastructure resilience, reduced risk of wastewater pollution incidents and reduced requirement for future emergency repair and maintenance activities.

(b) The cumulation with other existing development and/or approved development

An initial review of existing and approved development within the proximity of the proposed pipeline route has been undertaken to provide a high-level review of potential cumulative effects (i.e. in-combination effects / inter-project effects). A Planning History search has not identified any current planning applications, or recent consents, within the Application Site. Given the temporary and localised nature of the pipeline works, and the absence of significant operational effects, no significant cumulative effects are anticipated. On this basis, cumulative effects with other development are not considered likely to be significant in EIA terms.

(c) The use of natural resources, in particular land, soil, water and biodiversity

In light of the Application Site being partly located within SSSI, detailed consideration has been given the proposed construction approach. As described, DCWW propose to undertake works to replace the pipeline within the SSSI utilising the trench box construction method, which represents a less invasive development option reducing the extent of excavation required and minimising vegetation clearance. In addition, a robust package of ecological enhancement works are proposed as part of the works, in order to protect and further enhance the biodiversity of the SSSI. It is not considered that the proposed development would give rise to any significant implications in respect of the use of natural resources, with environmental enhancement being a key driver for the works.

(d) The production of waste

The proposed development would generate limited waste during construction as excavated soils will be reused on site for reinstatement of the pipeline trench. Limited surplus material is therefore anticipated. No significant waste would be generated during the operational phase of the development. Given the temporary, localised nature of construction activities and the implementation of standard waste management measures, the production of waste is not considered likely to give rise to significant environmental effects.

(e) Pollution and nuisances

Potential pollution and nuisance effects would be restricted to the construction phase and would be limited, temporary and localised in nature. These may include short-term noise and vibration from excavation and pipe-laying activities – however, construction activities would be undertaken in accordance with standard best practice measures and compliance with relevant guidance. During the operational phase, the pipeline would be buried and would not give rise to any ongoing pollution or nuisance. With the implementation of best practice construction controls (as detailed fully within the enclosed CEMP), the development is not considered likely to result in significant pollution or nuisance effects in EIA terms.

(f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

The proposed development does not involve the storage or use of hazardous substances that would give rise to a risk of major accidents or disasters. The pipeline would be constructed using conventional techniques and materials and would operate as a buried asset with no above-ground operational processes. Potential risks during construction are limited to those typical of linear civil engineering works, which would be managed through standard construction health and safety procedures and industry best practice (as detailed within the enclosed CEMP). In terms of climate change, the development would not increase vulnerability to climate-related hazards nor exacerbate risks to people, property or the environment. On this basis, the risk of major accidents or disasters is not considered likely to be significant in EIA terms.

(g) The risks to human health

Potential risks to human health would be primarily associated with the construction phase and would be temporary and localised in nature. These may include short-term exposure to construction-related noise, dust and emissions from plant and vehicles. Construction activities would be undertaken in accordance with relevant health and safety legislation and standard best practice. During the operational phase, the pipeline would be buried and would operate as a sealed system, and would not give rise to emissions, discharges or other pathways that could pose a risk to human health. Taking account of the temporary and controlled nature of construction activities, and the absence of significant operational emissions or discharges, the development is not considered likely to give rise to significant risks to human health in EIA terms.

'Environmental Sensitivity of the Location of the Development'

It is set out at Paragraph 2 of Schedule 3 of the EIA regulations that "*The environmental sensitivity of geographical areas likely to be affected by development must be considered*", having regard to the following detailed criteria:

(a) the existing and approved land use;

It is the case that no change to the long-term land use would result from the development, as the pipeline is a replacement/upgrade on the existing pipeline infrastructure, which would be buried and the land fully reinstated (and furthermore, enhanced) following construction. Given the temporary nature of the construction works, the reinstatement of the land, and the absence of any operational land take, the development is not considered likely to give rise to significant effects in relation to existing or approved land use in EIA terms.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

Work within the SSSI will be carried out under strict ecological supervision and will be subject to robust ecological controls. Extensive ecological mitigation and enhancement measures are proposed, both during and following the completion of works. The measures outlined within the Ecological Method Statement (as detailed below) will ensure compliance with SSSI consent requirements and avoidance of adverse effects on the integrity and conservation objectives of the SSSI. In light of the long-term enhancement, management, and monitoring measures proposed, it is the case that the regenerative capacity of the natural environment will therefore be enhanced in the long-term. It is pertinent to note that the installation of the new pipeline infrastructure will ensure that the risk of future pipeline breaches is reduced, thereby providing environmental betterment for the SSSI and wider area.

(c) the absorption capacity of the natural environment paying particular attention to the following areas—

- (i) wetlands, riparian areas, river mouths;*
- (ii) coastal zones and the marine environment;*
- (iii) mountain and forest areas;*

- (iv) nature reserves and parks;*
- (v) European sites and other areas classified or protected under national legislation;*
- (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered there is such a failure;*
- (vii) densely populated areas;*
- (viii) landscapes and sites of historical, cultural or archaeological significance.*

The site is located within a SSSI, which represents an area of low absorption capacity, due to the fragility of its habitats and the importance of its species assemblages. The design and construction approach will avoid significant effects on the SSSI, with careful management maintaining its ecological integrity. Furthermore, the development represents a beneficial infrastructure investment, with temporary construction balanced against the longer-term benefits of improved infrastructure resilience, reduced risk of wastewater pollution incidents, and reduced requirement for future emergency repair and maintenance activities.

'Types and Characteristics of Potential Impact'

The type and characteristics of the potential impacts arising as a result of the development are considered below, having regard to the criteria under Paragraph 3 of Schedule 3, namely:

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- (b) the nature of the impact;*
- (c) the transboundary nature of the impact;*
- (d) the intensity and complexity of the impact;*
- (e) the probability of the impact;*
- (f) the expected onset, duration, frequency and reversibility of the impact;*
- (g) the cumulation of the impact with the impact of other existing and/or approved development;*
- (h) the possibility of effectively reducing the impact.*

Ecology & Biodiversity

The proposed pipeline crosses land which is designated as SSSI, which by its nature is subject to biodiversity and habitats of high ecological value. A substantial amount of ecological survey work has been undertaken to inform the Marlas rising main upgrade works, including a detailed programme of phase 1 and phase 2 surveys. To inform the pipeline construction within the section of SSSI within Neath Port Talbot, TACP have prepared the enclosed report 'Ecological Constraints and Method Statement for Margam Moors SSSI' (TACP June 2026). This details the ecological methods to be followed at the Margam Moors SSSI, which will be undertaken in accordance with legislation and protected species guidance when carrying out the vegetation clearance and pipe works, ensuring compliance with SSSI consent requirements and avoidance of adverse effects on the integrity and conservation objectives of the SSSI).

A significant package of controls; mitigation, management, and monitoring measures are set out the Ecological Method Statement which include the following:

Controls

Each area of works within the SSSI will be subject to a Pre-works Assessment, Pre-Works Check, Environmental Permit to Work (if required), a Toolbox Talk, and a full Ecological Watching Brief as required – as summarised below:

- Pre-works Assessment: Prior to mobilising clearance or contractor teams, each area will be subject to a Pre-works Assessment by an EcCoW to ensure conditions have not significantly changed since the initial assessments. In the event of any significant changes, the methods may

require updating. In areas where ecological sensitivity is negligible further ecological input (i.e. subsequent steps) may not be required – this will be agreed by the Project Ecologist. Unless agreed otherwise, all subsequent steps must be followed. To enable assessment prior to works, a site engineer (or equivalent) will accurately identify and demarcate areas for clearance and overland pipe works to the environmental team. It is the responsibility of the site engineer (or equivalent) to allow sufficient time wherever possible for the Pre-works Assessments to be carried out to avoid delays.

- **Environmental Permit to Work (EPTW):** Following the Pre-works Assessment, a request to work will be submitted by the site engineer (or equivalent) and an Environmental Permit to Work (EPTW) will then be issued by an EcCoW. This will detail the work to be undertaken (including methods), any sensitive environmental receptors and the environmental supervision required. It will be held onsite by those carrying out the works and reviewed, amended and signed by environmental/ecological supervisors as required. Any amendments to the methods agreed during the works will be noted on the EPTW. EPTW must be issued for all works, this includes, but is not limited to, the creation of access tracks, trial pits, and similar works. Even if no environmental controls are anticipated, an EPTW must be issued before clearance works or topsoil strip works can commence in a specified location. The EPTW must be signed by an EcCoW, site engineer (or equivalent), and groundworkers. This confirms their understanding of the information and methods and controls required prior to works commencing in the area under the EPTW and confirms that the methods and controls in place will be followed. Upon completion of the work covered by an EPTW, it is the responsibility of the contractor/section engineer (or equivalent) to ensure the permit is returned to the EcCoW as a record of the works completed and approach taken.
- **Pre-Works Check:** Immediately prior to any vegetation clearance or overground pipe works, or topsoil strip, a Pre-Works Check is to be undertaken by an EcCoW. This will include visual checks and a hand and/or fingertip check as appropriate to ensure all protected species have been identified and safely removed (if appropriate). If there are restrictions that prevent this Pre-Works Check being undertaken sufficiently then the clearance method may require review and modification. Any modifications required will be focused on small, localised areas where possible and not necessarily be applicable to the entire clearance area. Some areas may require no further ecological input beyond the Pre-Works Check. In areas where ecological sensitivity is negligible, as determined during the Pre-works Assessment, a Pre-Works Check may not be required.
- **Toolbox Talks:** Relevant toolbox talks will be delivered to all operatives working on clearance areas concerning wildlife and legal requirements relating to the works. Operatives will sign these before commencing with vegetation clearance and overground pipe works.
- **Ecological Watching Brief:** All works are to be conducted under an Ecological Watching Brief provided by the onsite EcCoW or unless specified otherwise by the Project Ecologist. Exceptions include if there are negligible ecological constraints (as assessed by the EcCoW or Project Ecologist at the Pre-works Assessment or Pre-Works Check stage). A minimum of one EcCoW per clearance and contractor gang will be required working within a single area unless specified otherwise prior to commencement. I.e. if two excavators are stripping topsoil within the same general vicinity, two EcCoWs will be required to cover the watching brief.

Mitigation

The Statement includes detailed methods to address any impacts to, and mitigation for the following species, habitat and designated site (please refer to the full Ecological Method Statement for full details):

- Bats

- Otters
- Great Crested Newts
- Dormice
- Badger
- Reptiles & other amphibians
- Breeding birds
- Invertebrates
- Margam Moors SSSI habitats

Management and Monitoring

A number of specific measures in relation to management and ongoing monitoring are set out within the Ecological Mitigation Statement, including the following:

- Grazing should be avoided while vegetation is established. This is of relevance to species which require additional time for growth to mature to a point it can withstand trampling/grazing. E.g. After the first year of plant species establishing, we would expect to see signs of re-generation of most species mentioned between 3 and 5 years, depending on weather conditions.
- A target species list will be created based on those species present in the relevant SSSI habitats. This can be used as a checklist as part of monitoring the re-establishing site.
- Monitoring of recovering vegetation in the establishment phase should initially consist of general observations to identify “weeds” (non-target) species which can then either be removed by hand. This is to prevent desirable species being outcompeted.
- Following the temporary overground pipe works and permanent installation, a Landscape Environment Management Plan will be provided to ensure the recovery and establishment of habitats and protected species.

Rhyne Treatment

As set out above, all rhyne crossings will be subject to installation of pipeline beneath the rhyne bed allowing the existing rhyne profile, bed and banks to be retained. From an ecological perspective, locating the pipeline below the bed minimises direct disturbance to aquatic and marginal habitats and avoids the introduction of permanent infrastructure into the watercourse. Subject to the robust construction controls and reinstatement (as detailed within the enclosed TACP reports), any disturbance associated with the crossing would be temporary, with the existing channel and associated habitat capable of being retained and restored following completion of the works.

Summary

In summary, as set out above, careful mitigation and compliance with statutory requirements will be necessary to avoid adverse impacts on the features of the SSSI. In summary, the pipeline will be installed using best practice construction methods, with the Trench Box approach the preferred option due to reduced construction footprint and lower ecological risk. Work within the SSSI will be carried out under strict ecological supervision and will be subject to robust ecological controls. Extensive ecological mitigation and enhancement measures are proposed, both during and following the completion of works. The measures outlined within the Ecological Method Statement will ensure compliance with SSSI consent requirements and avoidance of adverse effects on the integrity and conservation objectives of the SSSI. No operational impacts are expected, as the pipeline will be buried and will not alter habitats post-construction.

Based upon the above assessment and the detailed information provided in the enclosed TACP Report, the development is not considered likely to result in significant ecological effects.

Traffic & Transportation

Construction of the proposed pipeline will generate temporary construction traffic, including delivery materials, and movement of plant and machinery. Traffic impacts will be short-term and localised.

Appropriate traffic management measures will be implemented as required, which will be managed in accordance with standard highway safety practices, and agreed with the Local Highways Authority by means of requisite highways approvals.

Once operational, the pipeline is fully buried, requiring no ongoing traffic movements or maintenance that would impact highways. Overall, the temporary and managed nature of construction traffic means that significant effects in traffic and transportation terms are not anticipated.

Noise & Vibration

Potential, but limited noise effects could arise in association with construction activities, including excavation works. However, noise and vibration levels would be expected to be of low magnitude, as no heavy piling or blasting is required for the pipeline installation. Construction works are temporary, localised, and linear, and it is the case that no receptor will be exposed to elevated noise levels any significant period. Standard noise mitigation measures will be applied, including:

- Restricting construction to normal working hours;
- Using well-maintained plant to minimise noise emissions;
- Locating machinery away from sensitive receptors.

No significant noise impacts are expected during the operational phase, as the pipeline is buried and does not contain moving parts or above-ground plant. Overall, construction-phase noise is expected to be temporary and minor, and the development is not considered likely to give rise to significant noise impacts in EIA terms.

Air Quality

Potential, but limited air quality effects could arise in association with construction activities, including:

- Dust generated during excavation and reinstatement;
- Exhaust emissions from construction vehicles;
- Delivery of materials.

However, potential impacts will be temporary, localised, and minor, and standard mitigation measures will be implemented, including:

- Minimising the extent of exposed soil;
- Limiting vehicle speeds;
- Ensuring plant and machinery are well-maintained.

Once operational, the pipeline is buried and sealed, so it will not generate emissions or affect air quality. Overall, the development is not considered likely to give rise to significant air quality impacts in EIA terms.

Heritage

As noted above, within the boundary of Neath Port Talbot, the subject site is located to the north of the boundary of the Registered Historic Landscape Area. The site is not located within the Historic Landscape designation itself, but is located within a Character Area associated with the aforementioned landscape area. Given that the above-ground impacts of the development will be temporary in nature and associated with the construction phase of the works, it is envisaged that there will be no long-term impact upon the historic landscape setting. Works once completed (encompassing a below-ground pipeline with full reinstatement along the construction corridor) will not alter the setting of the Historic Landscape (with the area already impacted by the proximity of modern infrastructure, including the adjacent M4 motorway and mainline railway line). However, as stated, the pipeline will be located primarily below-ground and will therefore have no impact on the wider historic landscape.

Based upon the above, the development is not considered likely to result in significant effects in relation to heritage matters.

Landscape & Visual Impact

Any potential impact of the proposed development in relation to landscape and visual effects will be associated with construction activities only, primarily including excavation works. These effects will be temporary, linear, and localised. Following the installation of the pipe, the pipeline will be buried, and land will be fully reinstated – as such, there will be no long-term visual impact associated with the proposed development. Temporary visual effects may be noticeable from the adjacent public right of way or potentially nearby dwellings during construction, but again these will be short-term and limited in spatial extent. Mitigation measures minimising clearance of vegetation and undertaking careful reinstatement will minimise any visual impact.

The development is not considered likely to result in significant landscape or visual effects. Temporary construction-phase effects are recognised but are reversible and manageable with standard best practice.

Human Health & Population

Potential impacts on human health and the local population are primarily associated with the construction phase. These could potentially include:

- Temporary exposure to construction dust, noise, and vibration;
- Increased construction traffic with potential for minor delays or safety risks;
- Temporary disruption to land access.

Sensitive receptors include nearby residents and users of public access routes along the pipeline corridor. However, effects would be temporary, localised, and reversible, and standard mitigation measures would be implemented to reduce potential impacts.

As noted, the route of the replacement pipeline runs within close proximity/traverses a number of public rights of way, including 5/92.PT/3 and 5/93.PT/1. As outlined within the enclosed CEMP, measures will be undertaken to ensure public safety and continuity of access throughout the construction period, as follows:

- All affected routes will be clearly signposted, and temporary diversion paths will be provided when necessary to maintain connectivity. The construction team will work closely with the local authority to comply with relevant PRow legislation and to obtain any required permissions for temporary closures or diversions.
- Where construction activities occur near PRowS, temporary protective fencing will be installed to separate the public from active work areas, equipment movements, and excavations. Clear signage will indicate safe pedestrian routes, provide information on diversion lengths and durations, and include contact details for reporting any queries or concerns. Any planned temporary closures will be communicated in advance to residents, community groups, and landowners to minimise inconvenience.
- After the construction is completed, all PRowS affected by the work will be restored to their original condition or enhanced as appropriate. Reinstatement will ensure that surface quality, drainage, and accessibility are maintained at or improved to pre-construction standards. Ongoing monitoring during and after construction will confirm that the reinstated PRowS remain safe, accessible, and fully operational for public use.

During operation, the pipeline is fully buried and sealed, so will not affect human health or the local population. Overall, the development is not considered likely to result in significant effects on human health or the population in EIA terms.

Requirement for EIA – Summary

As set out within this letter, DCWW request a formal Screening Opinion from Neath Port Talbot County Borough Council as to whether the proposed construction of a replacement below-ground pipeline constitutes EIA development.

As the route of the pipeline crosses two Local Authority areas (i.e Neath Port Talbot County Borough Council and Bridgend County Borough Council), the request for an EIA Screening Opinion is submitted to both Local Planning Authorities concurrently (with a Screening Direction to be issued by each Authority in relation to the area of land located within their jurisdiction accordingly). The full length of the pipeline extends to 5.75km. To confirm, the length of pipeline located within Neath Port Talbot specifically extends to circa 4.75km.

In summary, the proposal constitutes Schedule 2 development and is partially located within a 'sensitive area' as defined in regulation 2(1). In assessing whether the Schedule 2 development is likely to have significant effects on the environment, having regard to the characteristics of the development; the environmental sensitivity of the location; and the types and characteristics of the potential impact (in accordance with the criteria set out within Schedule 3 of the Regulations), it is not considered that the proposed development would give rise to environmental effects which are significant in nature.

As outlined within this letter, the works to construct the replacement pipeline are temporary in nature, with the working area to be fully reinstated following construction. The works are necessary in order to replace the existing deteriorating pipeline infrastructure, which has been subject to a number of breaches in recent years, resulting in adverse environmental impact on the SSSI through which the pipeline runs. The newly installed infrastructure will provide a substantial betterment in terms of long-term environmental quality, ensuring that the risk of future and ongoing pipeline breaches is reduced. The development therefore represents a beneficial infrastructure investment, with any temporary environmental effects associated with construction balanced against the longer-term benefits of improved infrastructure resilience, reduced risk of wastewater pollution incidents, and reduced requirement for future emergency repair and maintenance activities.

As set out within this letter and accompanying reports, any temporary environmental impact during the construction period will be minimised through sensitive construction methods (including for example the installation of the pipeline beneath the rhine bed where crossings are required). In addition, a robust package of ecological protection and enhancement works is proposed in order to protect and enhance the SSSI. Following completion of construction works, the operational impacts of the proposed development will be negligible as the pipeline is primarily below-ground and fully buried/sealed, with full reinstatement works undertaken.

Based on the information provided and having regard to the characteristics, scale, nature and location of the proposed development, together with the criteria set out in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, **it is considered that the proposed development would not be likely to give rise to significant environmental effects. The proposed development therefore does not constitute "EIA Development" within the meaning of the Regulations.**

We would be grateful if you could review this request for an EIA Screening Opinion and formally respond accordingly. Should you require any further information, please do not hesitate to contact me.

Yours sincerely,



Catherine Blyth

Associate Director
Asbri Planning Ltd.